

Nicole Giacinti (SBN 233121)
Morris & Giacinti LLP
899 Ellis Street
San Francisco, CA 94109
Tel: (415) 553-3902
Fax: (415) 848-9130

Counsel for Defendant, Regina Dean

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	No.: CR 13-00212 PJH
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER CONTINUING HEARING AND
v.)	EXCLUDING TIME
)	
REGINA DEAN,)	Date: April 4, 2013
)	Time: 9:30 a.m.
)	Court: Judge Kandis Westmore
)	
Defendants.)	

On March 27, 2013, the Court held a detention hearing in this case and set April 4, 2013, as the date for preliminary hearing or arraignment. On March 28, 2013, the government filed an indictment against the above named defendant. Counsel for defendant has a previously scheduled conflicting court appearance on the date currently scheduled for arraignment. The next available date for both defense counsel and the government is April 9, 2013. The parties hereby stipulate and request to set the date for arraignment on the recently filed indictment for April 9, 2013.

Pursuant to 18 U.S.C. § 3161, the defendant and the government consent to the extension of time and the parties represent that good cause exists for this extension, including continuity of counsel. *See* 1 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such an extension of time outweigh the best interests of the public and the defendant

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1 in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

2
3 **It is so stipulated.**

4
5 April 1, 2013
6 Dated

/s/
7 Brian Lewis
8 Assistant United States Attorney

9
10 April 1, 2013
11 Dated

/s/
12 Nicole Giacinti
13 Counsel for Regina Dean

14 **[PROPOSED] ORDER**

15 For the reasons stated above, the Court sets April 9, 2013, as the date for arraignment.
16 The Court also finds that exclusion of time from April 4, 2013, to April 9, 2013, from the time
17 limits applicable under 18 U.S.C. § 3161 is warranted; that the ends of justice served by the
18 continuance outweigh the interests of the public and the defendant in the prompt disposition of
19 this criminal case; and that the failure to grant the requested exclusion of time would deny
20 counsel for the defendant continuity of counsel and would result in a miscarriage of justice. 18
21 U.S.C. § 3161(h)(7)(B)(iv).

22 **It is so ordered.**

23
24 4/3/13
25 Dated

Kandis Westmore
26 The Honorable Kandis Westmore
27 United States Magistrate Judge
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